



Alfred E. Mann Institute for Biomedical Engineering

November 22, 2006

Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Reply Comments  
ET Docket No. 06-135 & RM-11271

Dear Chairman Martin:

The Alfred Mann Institute for Biomedical Engineering ("AMI") at the University of Southern California offers its strong support for the Alfred Mann Foundation's ("AMF") request that the Commission adopt service rules and allocate up to 20 MHz of spectrum to accommodate new wireless wideband microstimulator devices on a secondary basis. AMI was established at the University of Southern California for the purpose of aiding the commercialization of biomedical products arising from research and inventions at the University.

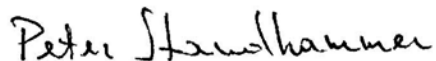
AMI and AMF have both been established through endowment by Alfred E. Mann. However, AMI and AMF are totally separate legal and operational entities.

For the past six years, AMI has worked on the development of implantable microstimulators – largely in parallel with the work at AMF. Implantable microstimulators represent a new generation of wideband medical devices designed to restore function to paralyzed limbs and dysfunctional organs. They offer a safer, less expensive and more effective treatment option than existing equipment and protocols. The devices are currently at the clinical trial stage. The establishment of a service allocation is vital to the application of such devices in clinical practice.

The Commission's rules currently do not provide any spectrum to permit operation of new wireless wideband microstimulator devices. Although the Commission has allocated some spectrum for medical telemetry operations and for medical implant communications services, this spectrum is not suitable for wideband medical implant devices that require larger bandwidths to perform more complex functions. Without adequate spectrum and service rules to support the operation of these innovative devices, millions of Americans will be deprived of a safe and effective medical treatment for their debilitating health conditions.

The Commission's notice of inquiry issued in the above-referenced proceeding is an important first step toward adopting the necessary rules to encourage deployment of the next generation of wireless wideband microstimulator devices. The Alfred Mann Institute urges the Commission to continue its efforts in this area by expeditiously granting AMF's request for commencement of a separate rulemaking.

Sincerely,

A handwritten signature in cursive script that reads "Peter Staudhammer".

Peter Staudhammer  
Director

cc: Marlene H. Dortch  
FCC Secretary